

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

**In Re:** :  
**LAWRENCE ANTHONY POWELL,** : **Bankruptcy No. 23-11552-mdc**  
**Debtor** : **Chapter 13**  
**Freedom Mortgage Corporation** :  
**Movant** :  
 :  
 :  
v. :  
**LAWRENCE ANTHONY POWELL** : **11 U.S.C. §362**  
  
**and**  
**KENNETH E. WEST, ESQUIRE (TRUSTEE)**

**Respondent(s)** :

**CERTIFICATION OF NO ANSWER REGARDING FREEDOM MORTGAGE CORPORATION'S  
MOTION FOR RELIEF FROM STAY (DE 38)**

The undersigned hereby certifies that, as of August 30, 2023, the undersigned has received no answer, objection or other responsive pleading to the Movant's Motion for Relief from Stay.

The undersigned further certifies that I have reviewed the Court's docket in this case and no answer, objection or other responsive pleading to the Movant's Motion for Relief from Stay. Pursuant to the Notice of Motion, objections to the Movant's Motion were to be filed and served before August 16, 2023.

It is hereby respectfully requested that the Order attached to the Motion be entered at the earliest convenience of the Court.

Dated: September 6, 2023

Respectfully submitted,

Brock & Scott, PLLC

/s/Andrew Spivack

Andrew Spivack, PA Bar No. 84439

Matthew Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

Jay Jones, PA Bar No. 86657

Attorney for Creditor

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**and**  
**KENNETH E. WEST, ESQUIRE (TRUSTEE)**

**Respondent(s)** :

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and exact copy of the foregoing Certification of No Answer has been electronically served or mailed, postage prepaid on September 7, 2023 to the following:

LAWRENCE ANTHONY POWELL  
5850 OSAGE AVE  
PHILADELPHIA, PA 19143-1214

MICHAEL A. CIBIK, Debtor's Attorney  
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Suite 900  
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KENNETH E. WEST, Bankruptcy Trustee  
1234 Market Street - Suite 1813  
Philadelphia, PA 19107

Office of United States Trustee, US Trustee  
Robert N.C. Nix Federal Building  
900 Market Street Suite 320  
Philadelphia, PA 19107

/s/Andrew Spivack

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